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November 15, 2019

VIA ELECTRONIC FILING

Honorable Mark Falk, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Bldg. &
U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

RE: **Immunex Corporation, et al. v. Sandoz, Inc., et al.,**
Civil Action No. 16-1118 (CCC/MF)

Dear Judge Falk:

This firm, together with Sidley Austin LLP, represents Plaintiffs, Immunex Corporation and Amgen Manufacturing, Limited in connection with the above-referenced matter. The Omnibus Joint Motion to Seal and filed redacted versions of the following letters is due to be filed with the Court on Monday, November 18, 2019:

- Letter from Liza M. Walsh dated September 3, 2019 at DE No. 699;
- Letter from Sandoz dated September 3, 2019 at DE No. 700;
- Letter from Sandoz dated September 6, 2019 at DE No. 703;
- Letter from Liza M. Walsh dated September 6, 2019 at DE 704;
- Letter from Liza M. Walsh dated September 16, 2019 at DE 707;
- Letter from Sandoz dated September 16, 2019 at DE 708;
- Letter from Liza M. Walsh dated September 24, 2019 at DE 711;
- Letter from Marc D. Haefner dated October 1, 2019 at DE 715;
- Letter from Liza M. Walsh dated October 7, 2019 at DE 716; and
- Letter from Sandoz dated October 7, 2019 at DE 717.

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We write with the consent of all parties to respectfully request an extension until two weeks after the Court acts on the Letter from Sandoz regarding the Withdrawal of the Motion to Intervene dated October 21, 2019, DE 724, to file the redactions and the Omnibus Joint Motion to Seal the above referenced letters. The additional time is necessary to allow the parties the necessary time to coordinate and finalize both the proposed redactions as well as an Omnibus Joint Motion to Seal. We appreciate the Court's consideration of this request and, should the extension be acceptable to Your Honor, we respectfully request this letter be "So Ordered" and entered on the docket. As always, we thank the Court for its attention to this matter.


Respectfully submitted,

s/Liza M. Walsh

Liza M. Walsh

cc: All Counsel of Record (via ECF and email)

SO ORDERED this 18 day of November 2019


Honorable Mark Falk, U.S.M.J.